



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

August 17, 2023

BY ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State*,
No. 23 Civ. 1529 (VEC)

Dear Judge Caproni:

This Office represents defendant the United States Department of State in the above-referenced action brought pursuant to the Freedom of Information Act ("FOIA"). On June 16, 2023, the Court extended the deadline for defendant to respond to the complaint *sine die* so that the parties could continue their discussions and directed the parties to file a status letter by today. ECF No. 16.

On behalf of defendant, and together with the plaintiffs, I write respectfully to propose the following schedule for answering the complaint and summary judgment briefing. September 22, 2023: defendant's answer to the complaint; October 23, 2023: Defendant's motion; November 24: Plaintiffs' opposition; December 15, 2023: Defendant's reply.

We thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York
Attorney for Defendant

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cc: *Plaintiffs' counsel* (by ECF)